

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FOSSA LTD., ICELANDICPLUS, LLC, and STEVEN BARLOW,	)	
	)	
Plaintiffs/Counterclaim Defendants,	)	
	)	
v.	)	
	)	
I JIAN LIN and ENCOMPASS COMMUNICATIONS, INC.,	)	
	)	
Defendants/Counterclaim Plaintiffs,	)	C.A. No. 1:16-cv-11914-LTS
	)	
v.	)	
	)	
VALENTIN DAVID GURVITZ, ESQ., BOSTON LAW GROUP, P.C., and SONYA LIVSHITS,	)	
	)	
Counterclaim Defendants.	)	
	)	

**ASSENTED-TO MOTION FOR BRIEF EXTENSION OF TIME  
FOR PLAINTIFFS TO FILE AN AMENDED COMPLAINT**

Plaintiffs/Counterclaim Defendants Fossa Ltd., IcelandicPLUS, LLC, and Steven Barlow, with the assent of Defendants/Counterclaim Plaintiffs I Jian Lin and Encompass Communications, Inc. and Counterclaim Defendants Valentin Gurvits, Boston Law Group, P.C., and Sonya Livshits, respectfully request that this Honorable Court extend the deadline for: (a) Plaintiffs to file an Amended Complaint, which shall not include any causes of action under the Racketeer Influenced and Corrupt Organizations Act, until and including Friday, November 24, 2017; and (b) Defendants to file an Answer to Plaintiffs' Amended Complaint and an Amended Counterclaim until and including December 29, 2017.

As grounds for this motion, Plaintiff's state that:

1. Due to a number of emergencies in other matters, Plaintiffs' counsel requires an additional four days to file an Amended Complaint.
2. All other parties in this matter have assented to Plaintiffs' motion.
3. Allowing Plaintiffs' motion will not result in prejudice to any party or cause undue delay, and is in the interest of judicial economy.

Respectfully submitted,

/s/ Thomas M. Ciampa

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*Counsel for Steven Barlow, Fossa Ltd.,  
IcelandicPLUS, LLC, and Sonya Livshits*

ASSENTED TO:

/s/ Daniel J. Murphy

Daniel J. Murphy  
*Counsel for I Jian Lin and  
Encompass Communications, Inc.*

ASSENTED TO:

/s/ Evan Fray-Witzer

Evan Fray-Witzer  
*Counsel for Valentin Gurvits,  
Boston Law Group, P.C.*

Dated: November 20, 2017

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on November 20, 2017.

/s/ Thomas M. Ciampa